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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

16 LOS ANGELES WATERKEEPER, a
17 California non-profit association,

18 Plaintiff,

19 v.

20 ARCADIA PRODUCTS, LLC, a
21 Colorado limited liability company,

22 Defendant.

Case No. 2:24-cv-03445-FLA-SSC

**NOTICE OF COMPLETED AGENCY
REVIEW; REQUEST TO ENTER
[PROPOSED] CONSENT DECREE**

**(Federal Water Pollution Control Act,
33 U.S.C. §§ 1251 to 1387)**

1 TO THE CLERK OF THE COURT, ANY INTERESTED PARTIES, AND
2 THEIR ATTORNEYS OF RECORD:

3 PLEASE TAKE NOTICE that the 45-day agency-review period has
4 concluded as of December 2, 2024. *See* 33 U.S.C. § 1365(c) (requiring that “[n]o
5 consent judgment shall be entered in an action in which the United States is not a
6 party prior to 45-days following the receipt of a copy of the proposed consent
7 judgment by the Attorney General and the Administrator”); and, 40 C.F.R. §
8 135.5 (requiring the parties to provide notice to the court of the 45-day agency
9 review period under 33 U.S.C. § 1365(c)).

10 PLEASE TAKE FURTHER NOTICE that the Department of Justice’s
11 November 25, 2024 letter confirming that it does not object to the entry of the
12 proposed consent decree is filed herewith as **Exhibit 1**;

13 **NOW THEREFORE**, Plaintiff Los Angeles Waterkeeper respectfully
14 requests that the Court execute and enter the proposed consent decree, filed
15 herewith as **Exhibit 2**, and dismiss the claims with prejudice, except to the
16 extent provided for in the proposed consent decree to interpret, modify or
17 enforce the proposed consent decree.

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19 Date: December 2, 2024

LAW OFFICE OF WILLIAM CARLON

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25 Los Angeles Waterkeeper
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